

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY IN SUPPORT OF  
PLAINTIFFS' MOTION TO COMPEL RULE 30(b)(6) DEPOSITION TESTIMONY  
FROM DEFENDANTS CHARLESBANK CAPITAL PARTNERS, LLC AND BAIN  
CAPITAL PRIVATE EQUITY, LLC**

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Plaintiffs Jessica Jones and Christina Lorenzen (Plaintiffs”), by and through their undersigned counsel, hereby file this Motion for Leave to File Reply (“Motion”) in Support of their Motion to Compel Rule 30(b)(6) Deposition Testimony from Defendants Charlesbank and Bain (“Underlying Motion”), pursuant to Local Rule 7.2(c). Plaintiffs filed the Underlying Motion on May 19, 2022. ECF No. 304. Defendants responded in opposition on May 24, 2022 (“Opposition”). ECF No. 311.

Plaintiffs respectfully request an opportunity to file a reply to clarify the record and respond to Defendants’ points in opposition. Defendants have raised several new issues not raised during the meet and confer process which warrant a response. Defendants also ignore certain key facts which cut against their arguments that Plaintiffs would like to raise with the Court. For these reasons, Plaintiffs seek leave to file a reply brief by May 27, 2022.

Dated: May 25, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF CONSULTATION**

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that on May 24, 2022, my colleague, David Seidel, emailed counsel for Defendants (specifically Steven Kaiser) advising them that Plaintiffs intended to file a motion seeking the relief set out above and asking if they opposed. Defendants did not respond.

/s/ Joseph Saveri  
Joseph Saveri

**CERTIFICATE OF SERVICE**

I hereby certify that on May 25, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri

Joseph R. Saveri